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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
DAVIE JIMMY MEJIA-SENSENTE,)
a/k/a "Crazy,")
a/k/a "Loco,")
CARLOS MEJIA-QUINTANILLA,)
a/k/a "Wilfredo Oliva-Castro,")
a/k/a "Sleepy,")
a/k/a "Dormido,")
LUIS AMILAR-ZANAS,)
a/k/a "Luis Sana,")
a/k/a "Trucha,")
a/k/a "Yomo,")
Defendants.)

No. CR 11-0293 CRB

**STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING STATUS
CONFERENCE AND EXCLUDING
TIME**

SAN FRANCISCO VENUE

Current Date: April 25, 2012

Proposed Date: June 6, 2012

1 The above-captioned case is currently scheduled for a status conference Wednesday,
2 April 25, 2012. However, the government will soon produce additional discovery pursuant to
3 the Protective Order, and defense counsel will require additional time to review that discovery.
4 In addition, counsel for the government will be unavailable on April 25, 2012.

5 Accordingly, the parties now stipulate and jointly request that the status conference currently
6 set for April 25, 2012 be vacated, and that the Court set this matter for a status conference on
7 June 6, 2012.

8 Further, the parties stipulate April 25, 2012 through June 6, 2012 for effective preparation of
9 counsel. The exclusion of time is necessary in light of the time needed to produce and review
10 the requested discovery. The parties agree that the ends of justice served by granting such a

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1 continuance outweighed the best interests of the public and the defendant in a speedy trial. *See*
2 18 U.S.C. § 3161(h)(8)(A).

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4 IT IS SO STIPULATED:

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6 MELINDA HAAG
7 United States Attorney

8 DATED: 4-12-12

9 By: _____/s/
10 ANDREW M. SCOBLE
11 MATTHEW L. McCARTHY
12 Assistant United States Attorneys

13 DATED: 4-12-12

14 By: _____/s/
15 DAVID ANDERSON
16 Attorney for Defendant
17 DAVIE JIMMY MEJIA-SENSENTE

18 DATED: 4-12-12

19 By: _____/s/
20 JAMES McNAIR THOMPSON
21 Attorney for Defendant
22 CARLOS MEJIA-QUINTANILLA

23 DATED: 4-12-12

24 By: _____/s/
25 TONY TAMBURELLO
26 Attorney for Defendant
27 LUIS AMILAR-ZANAS
28

1 **~~PROPOSED~~ ORDER**

2 For good cause shown, the status conference now scheduled for April 25, 2012 is
3 vacated. The matter shall be added to the Court's calendar on June 6, 2012 for setting of future
4 dates.

5 In addition, for the reasons stated above, the Court finds that an exclusion of time
6 from April 25, 2012 through June 6, 2012 is warranted and that the ends of justice served by the
7 continuance outweigh the best interests of the public and the defendant in a speedy trial. See 18
8 U.S.C. §3161 (h)(7)(A). The failure to grant the requested continuance would deny defense
9 counsel the reasonable time necessary for effective preparation, taking into account the exercise
10 of due diligence, and would result in a miscarriage of justice. See 18 U.S.C. §3161(h)(7)(B)(iv).

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12 IT IS SO ORDERED.

13 04/20/2012

14 _____
15 DATED

